



(CMHCC), and I work with TDCJ's contracted university healthcare providers to ensure that quality health care services are provided to incarcerated offenders in the custody of TDCJ.

4. Since the onset of the detection and spread of the COVID-19 virus in Texas in March 2020, I have worked with the joint medical directors, Dr. Owen J. Murray, D.O., MBA, Vice President Offender Care Services, UTMB Correctional Managed Care (CMC) and Dr. Denise DeShields, M.D., Executive Medical Director, Texas Tech University Health Sciences Center (TTUHSC) CMC to develop Policy B-14.52, Coronavirus Disease 2019 (COVID-19). The joint medical directors have also consulted with Dr. Janak Patel, M.D. Dr. Patel is the Director, Department of Infection Control and Healthcare Epidemiology at UTMB. In addition, the joint medical directors also consulted with Dr. Philip Keiser, M.D., UTMB Professor of Infectious Disease and Galveston County Public Health Authority. Dr. Keiser also is a member of the CMHCC.

5. CMHC Infection Control Policy B-14.52 was initially developed by a joint subcommittee of UTMB, TTUHSC and TDCJ Health Services staff. The subcommittee was chaired by Dr. Stephanie Zepeda, PharmD. The subcommittee members developed CMHC Infection Control Policy B-14.52 to adhere to guidance issued by the U.S. Centers for Disease Control and Prevention (CDC) for the management of COVID-19. The subcommittee's work product was forwarded to the three joint medical directors for review and approval, since the CHMCC was unable to meet due to the disaster declaration related to COVID-19.

6. Dr. Zepeda is a Doctor of Pharmacy and graduated Summa Cum Laude from the University of Houston College of Pharmacy in 1997. Dr. Zepeda completed a post-graduate Pharmacy Practice residency with an emphasis in Managed Care with the University of Houston and TFCJ in 1998. Dr. Zepeda began her career as a clinical pharmacist with the University of Houston College of Pharmacy serving the TDCJ. She joined UTMB Correctional Managed Care as a

pharmacy clinical practice specialist in 2000 as the Assistant Director of Pharmacy. Dr. Zepeda was selected as the Director of Pharmacy for UTMB Correctional Managed Care in May 2006. Dr. Zepeda is responsible for providing operational and financial oversight for UTMB CMC Pharmacy Services.

7. All three joint medical directors are credentialed health professionals. The three medical directors include myself, Dr. Owen J. Murray, and Dr. Denise DeShields. Dr. Murray is the Vice President, Correctional Managed Care for UTMB. Dr. Murray graduated from the Chicago College of Osteopathic Medicine in 1988 and completed the Family Practice Residency Program at Michigan State University. Dr. Murray spent four years working in the Cook County Jail and the Illinois Department of Corrections. Dr. Murray received his MBA from the University of Houston Clear Lake and has been employed by UTMB for the past 25 years. Dr. DeShields is the Executive Medical Director of the TTUHSC's Correctional Managed Health Care Program. Dr. DeShields received her medical degree from Tufts University School of Medicine and specializes in family medicine. Dr. DeShields has served as the Executive Director, Managed Care, for the Texas Tech University Health Science Center since 1996 (24 years).

8. After review and careful consideration, each of the three joint medical directors approved adoption and implementation of CMHC Infection Control Policy B-14.52 on March 20, 2020. Once the policy was adopted, it was placed on the CMC intranet for wide dissemination to unit based staff, the policy was also placed in the Correctional Managed Health Care Infection Control Policy Manual and posted on the TDCJ website. Each university medical director (i.e. Dr. Murray and Dr. DeShields) held conference calls with each of their respective regions to review the policy and answer questions. A true and correct copy of the policy adopted on March 20, 2020, is attached to this declaration as **Attachment A**.

9. Three days later, on March 23, 2020, the CDC issued “Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities. The subcommittee reviewed this interim guidance issued by the CDC and recommended changes to CMHC Infection Control Policy B-14.52 to ensure that policy and practices were consistent with the guiding principles issued by the CDC. The medical directors approved the revisions recommended by the subcommittee and the revised version of CMHC Infection Control Policy B-14.52 was adopted and implemented on March 27, 2020. Once the revised policy was approved, it was included in the Correctional Managed Health Care Infection Control Policy Manual and widely disseminated via the CMC intranet. It was also made available on the TDCJ website. Dr. Murray and Dr. DeShields held conference calls with each of their respective regions to review the policy and answer questions. A true and correct copy of the revised policy adopted and effective on March 27, 2020, is attached to this declaration as **Attachment B**.

10. The subcommittee recommended updates to CMHC Infection Control Policy B-14.52, which were approved by the three medical directors for adoption and implementation in CMHC Infection Control Policy B-14.52, effective April 2, 2020. Once the updated policy was approved, it was included in the Correctional Managed Health Care Infection Control Policy Manual and widely disseminated via the CMC intranet. It was also made available on the TDCJ website. Dr. Murray and Dr. DeShields held conference calls with each of their respective regions to review the policy and answer questions. A true and correct copy of the revised policy adopted and effective on April 2, 2020, is attached to this declaration as **Attachment C**.


11. Thereafter, the subcommittee recommended additional updates to CMHC Infection Control Policy B-14.52 that were approved by the three medical directors and implemented on April 15, 2020. This latest version of the policy is in the process of being disseminated to the field

and it will be included in the Correctional Managed Health Care Infection Control Policy Manual and made available on the TDCJ website. The university medical directors will hold conference calls with their respective regions to review the policy changes and answer questions. A true and correct copy of the revised policy adopted and effective on April 15, 2020, is attached to this declaration as **Attachment D**.

12. As Director of the TDCJ Health Services Division, I have worked to help educate and advise TDCJ staff regarding the requirements and implementation of CMHC Infection Control Policy B-14.52.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2020.”

A handwritten signature in cursive script, reading "Lannette Linthicum", written in black ink on a white background.

Dr. Lannette Linthicum, MD, FACP